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MOSER LAW FIRM, PC



August 23, 2021

VIA ECF

Hon. Brian M. Cogan, USDJ
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Batista Rodriguez v. Electronic Deals, Inc.*, 21-cv-03110

Dear Judge Cogan:

I represent the Plaintiffs in the above referenced matter. Stephen D. Hans represents the Defendants. August 20, 2021 was the deadline for submission of the motion for court-authorized notice of the collective action. The parties are pleased to advise the Court that late Friday they were able to reach an agreement regarding of notice to the putative FLSA Collective, subject to Court approval.

The terms of stipulation regarding notice to the collective permit it to be filed by the Plaintiff on or after September 9, 2021. However, the parties are continuing to work together in an attempt to resolve the case in its entirety prior to that date. I therefore respectfully request leave to file the stipulation on September 9, 2021.

Respectfully submitted,

Steven J. Moser
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cc: All Counsel of Record (VIA ECF)